

EXHIBIT A
(PROPOSED ORDER)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re:

Victoria Teodorescu,

**Chapter 11
Case No. 14-23450 (RDD)**

Debtor

-----X

**PROPOSED ORDER (A) APPROVING DISCLOSURE STATEMENT,
(B) ESTABLISHING SOLICITATION, VOTING AND TABULATION
PROCEDURES, (C) SCHEDULING A CONFIRMATION HEARING,
ESTABLISHING PROCEDURES FOR FILING CONFIRMATION
OBJECTIONS, AND (E) GRANTING RELATED RELIEF**

A Plan of Reorganization dated July 29, 2016 (the “Plan”) and a corresponding Disclosure Statement (the “Disclosure Statement”) dated July 29, 2016 having been filed with this Court by Victoria Teodorescu, the debtor and debtor-in-possession herein (the “Debtor”); and upon the Debtor’s Motion for Entry of an Order Approving the Disclosure Statement, together with Related Relief (the “Motion”); and this Court having held a hearing on August 31, 2016, (the “Hearing”) to consider the adequacy of the Disclosure Statement; and sufficient notice of the Hearing and the relief requested having been provided, as evidenced by the affidavit of service filed with this Court (ECF No. Doc. ___); and certain modifications to the Disclosure Statement having been addressed by the Court and the creditors on the record; and there being no objections to the relief requested; and upon the record of the Hearing; and sufficient cause appearing therefor, and this Court having

FOUND, that the Disclosure Statement, as modified (the “Disclosure Statement”), contains “adequate information” as that term is defined in section 1125(a)(1) of chapter 11 of Title 11 of the United States Code, as amended (the “Bankruptcy Code”); it is

ORDERED, that the Motion is granted as set forth herein; and it is further

ORDERED, that the Disclosure Statement is hereby approved as containing adequate information within the meaning of section 1125 of the Bankruptcy Code; and it is further

ORDERED, that the Debtor is directed to transmit, by regular mail, a copy of the Disclosure Statement and the Plan, as modified (the “Plan”), to all of the Debtor’s creditors on or before *****, 2016 (the “Service Deadline”); and it is further

ORDERED, that objections, if any, to confirmation of the Plan must conform to the requirements of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules of the Southern District of New York and state with particularity the basis for the objection or relief requested (as applicable), and be filed with the Bankruptcy Court in accordance with General Order #462 by users of the Bankruptcy Court’s case filing system, and by all other parties, on a 3.5 inch disk, and served in accordance with Administrative order #476 and upon (a) Garvey, Tirelli & Cushner, Ltd., Attn: Todd S. Cushner, Esq., attorneys for the Debtors, 50 Main Street, Suite 390, White Plains, New York 10606, and (b) the Office of the United States Trustee, 201 Varrick Street, Suite 10006, New York, NY 10004, so as to be received no later than 5:00 p.m. five days prior to the Hearing Date, as defined below, (the “Objection Deadline”); and it is further

ORDERED, that a hearing to consider confirmation of the Plan, and any objections thereto, shall be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Courthouse, 300 Quarropas Street, White Plains, NY on *****, 2016 at 10:00 a.m. or such later date as the Court may direct.

Dated: White Plains, New York
_____, 2016

Hon. Robert D. Drain
U.S. Bankruptcy Judge